

TROUTMAN PEPPER LOCKE LLP
11682 EL CAMINO REAL, SUITE 400
SAN DIEGO, CA 92130

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18 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 17:**

19 Please produce all documents containing any of the following information for
20 each outbound telemarketing call sent by you or your vendor, including those made
21 to the Plaintiff:

- 22 a) the date and time;
23 b) the caller ID;
24 c) any recorded message used;
25 d) the result;
26 e) identifying information for the recipient; and any other information
27 stored by the call detail records.

28 **RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS NO. 17:**

1 Wilshire objects to Request for Production No. 17 to the extent it seeks
2 information protected by the work product doctrine or any other applicable
3 protection. Wilshire further objects to the extent this Request implies any calls
4 made by Wilshire constitute “telemarketing calls” as defined by 47 C.F.R. §
5 64.1200(f)(12)-(13). Wilshire objects on the grounds that this Request is vague and
6 ambiguous as to the term “result.” Wilshire further objects to this request as
7 overbroad to the extent it seeks information relating to calls not involving
8 prerecorded or artificial voices.

9 Subject to and without waiving its objections, Wilshire directs Plaintiff to
10 WILSHIRE_00000051-WILSHIRE_00000052.

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19 [REDACTED]

20 Dated: April 16, 2025

TROUTMAN PEPPER LOCKE LLP

21
22 By: /s/Christine Nowland

23 Chad R. Fuller
24 Virginia Bell Flynn
25 Christine Nowland
26 Attorneys for Defendant
27 WILSHIRE LAW FIRM, P.L.C.
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